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**From:** (b) (6)  
**Sent:** Friday, March 13, 2020 10:38 AM  
**To:** Leefers, Kristin  
**Subject:** Re: follow up from meeting with EPA

Thank you Kristin.

Sent from my iPhone

On Mar 13, 2020, at 10:11 AM, Leefers, Kristin <Leefers.Kristin@epa.gov> wrote:

We will not need the March statement, February is sufficient.

Thanks,

Kris

Kris Leefers

206-553-1532

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**From:** Paramjit Hothi <(b) (6)>  
**Sent:** Thursday, March 12, 2020 12:04 PM  
**To:** Leefers, Kristin <Leefers.Kristin@epa.gov>  
**Subject:** Re: follow up from meeting with EPA

Hi Kristin,

Thank you. If you require March statement I can provide after March 31.

Regards,

Parm

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**From:** Leefers, Kristin <[Leefers.Kristin@epa.gov](mailto:Leefers.Kristin@epa.gov)>

**Sent:** March 10, 2020 4:41 PM

**To:** Paramjit Hothi <(b) (6)>

**Subject:** RE: follow up from meeting with EPA

Thank you for sending this Mr. Hothi. I'll be in touch soon.

Kris

Kris Leefers

206-553-1532

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**From:** Paramjit Hothi <(b) (6)>  
**Sent:** Tuesday, March 10, 2020 3:41 PM  
**To:** Leefers, Kristin <[Leefers.Kristin@epa.gov](mailto:Leefers.Kristin@epa.gov)>  
**Subject:** Re: follow up from meeting with EPA

H Kristin,

Please find attached last months bank statement as promised. Sorry about delay but I had issues with online password and then I got locked out of my account. So that is why it took extra day.

Any questions please let me know.

Parm Hothi

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From: Leefers, Kristin <[Leefers.Kristin@epa.gov](mailto:Leefers.Kristin@epa.gov)>

Sent: March 6, 2020 4:14 PM

To: Paramjit Hothi <(b) (6)>

Cc: Fowlow, Jeffrey <[Fowlow.Jeffrey@epa.gov](mailto:Fowlow.Jeffrey@epa.gov)>; Stanfield, Brooks <[Stanfield.Brooks@epa.gov](mailto:Stanfield.Brooks@epa.gov)>

Subject: RE: follow up from meeting with EPA

Dear Mr. Hothi,

Thank you for your prompt response to the questions from EPA in my email to you earlier this week. We appreciate the continued cooperation and sharing of information. We will review the statements made in this email, along with the other previously submitted financial documentation. Thank you also for sending the business license. I'll look in to the other information EPA has on this matter and let you know whether EPA has any remaining issues. For next steps, EPA will evaluate the information in your email, and then provide a proposed settlement offer. I understand you will likely want to wait until you have legal counsel to provide an response to EPA's offer. EPA is under a tight timeframe, as you know, but we will do our best to coordinate with your timing for hiring legal counsel.

Sincerely,

Kris

Kris Leefers

Assistant Regional Counsel

Deputy Unit Dive Officer

U.S. Environmental Protection Agency, Region 10

1200 Sixth Avenue, Suite 155

M/S: 11-C07

Seattle, Washington 98101

206-553-1532

[leefers.kristin@epa.gov](mailto:leefers.kristin@epa.gov)

*This transmission may contain confidential and/or privileged material. If you received this message in error, or are not the intended recipient, notify the sender via return email and delete this message.*

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From: Paramjit Hothi <(b) (6)>

Sent: Thursday, March 05, 2020 1:30 PM

To: Leefers, Kristin <[Leefers.Kristin@epa.gov](mailto:Leefers.Kristin@epa.gov)>

Cc: Fowlow, Jeffrey <[Fowlow.Jeffrey@epa.gov](mailto:Fowlow.Jeffrey@epa.gov)>; Stanfield, Brooks <[Stanfield.Brooks@epa.gov](mailto:Stanfield.Brooks@epa.gov)>

Subject: Re: follow up from meeting with EPA

Hi Kristin, Brooks and Jeffrey,

It was a pleasure to meet you all on March 3rd. We wanted to thank you so much for your time in meeting with us, and answering our many questions. We felt the meeting was a good exchange of information and we got our questions answered. As stated at the meeting it was alot of information to take in and alot of legal information that we have no idea about. So we will be hiring a lawyer to assist us. We will let you know name and details once this is finalized.

**First**, EPA noticed that in a few instances in the past, (b) (4)

Would that be a possible source of income for cleanup, and if so. (b) (4)

**Second**, the 2019 bank account balance provided to EPA showed approximately (b) (4)

(b) (4)

(b) (4)

Third, EPA noted (b) (4)

(b) (4)

I will provide you with my current bank account for this past month that shows you this. (to follow in separate email, once I get email from (b) (4)). may take few business days to get this to you, but will try upmost to get it in asap.

As for the issue in regards to: Administrative dissolution of Spokane Recycling by the Washington Secretary of State. I am confused about this because we have our Business License (attached). If I am missing something here, please let me know and I can investigate further, but this Business lenience expires August 31, 2020.

Thank you Brooks for the powerpoint.

We understand the strict timeline you are under and want to assist as much as we can.

Thank you again for your help with this matter.

Regards,

Paramjit Hothi

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From: Leefers, Kristin <[Leefers.Kristin@epa.gov](mailto:Leefers.Kristin@epa.gov)>

Sent: March 4, 2020 11:19 AM

To: (b) (6) <[doug@byrdrealestategroup.com](mailto:doug@byrdrealestategroup.com)>  
<[doug@byrdrealestategroup.com](mailto:doug@byrdrealestategroup.com)>

Cc: Fowlow, Jeffrey <[Fowlow.Jeffrey@epa.gov](mailto:Fowlow.Jeffrey@epa.gov)>; Stanfield, Brooks <[Stanfield.Brooks@epa.gov](mailto:Stanfield.Brooks@epa.gov)>

Subject: follow up from meeting with EPA

Good Morning All-

This email is to follow up on a few items from our meeting yesterday. I believe Brooks sent the powerpoint to you so you have an electronic version, but please let us know if you had any problems viewing that document.

We discussed three additional questions regarding Spokane Recycling's finances. Answering these questions will help EPA fully understand the financial situation of your company, and will help to assess what amount of money the company could afford to spend on cleanup at the property. First, EPA noticed that in a few instances in the past, (b) (4)

(b) (4) Would that be a possible source of income for cleanup, and if so, (b) (4)  
(b) (4) ? Second, the 2019 bank account balance provided to EPA showed (b) (4)

(b) (4) available for cleanup? If not, why not? Third, EPA (b) (4)

(b) (4), please provide EPA with information to document (b) (4).

We also discussed the administrative dissolution of Spokane Recycling by the Washington Secretary of State. In our recent research of Washington Secretary of State records, we found that Spokane Recycling received a delinquency notice on September 1, 2019 for not filing its annual report and the Washington Secretary of State informed Spokane Recycling to file its annual report by December 31, 2019 or it would be administratively dissolved or terminated. On January 3, 2020, the Washington Secretary of State sent a notice of administrative dissolution to Spokane Recycling. Can you let us know what your records or your information says about this matter?

Finally, we discussed bona fide prospective purchaser (or lessee) situations. EPA has a website with multiple fact sheets and information about the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund) protections for bona fide prospective purchasers. The website is here: <https://www.epa.gov/enforcement/common-elements-and-other-landowner-liability-guidance> These are the types of liability protections that could be available to future lessees of your property, if they meet the requirements. I've also attached the 2019 EPA Common Elements Guidance on this subject for your information.

Thank you for your participation in the meeting yesterday. EPA found it to be productive and we look forward to continued cooperation going forward.

Sincerely,

Kris

Kris Leefers

Assistant Regional Counsel

Deputy Unit Dive Officer

U.S. Environmental Protection Agency, Region 10

1200 Sixth Avenue, Suite 155

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Seattle, Washington 98101

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